



NORLITE CORPORATION

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March 8, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 2: 02/27/12 – 03/06/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 02/27/12 thru 03/06/12. The attached document explains each of the "malfunctions" for Kiln Two.

The results of the investigation concluded a majority of the waste feed cutoffs were a result of the span limit associated with the stack gas flow monitor. Norlite conducted several inspections of the scrubber system and stack gas probe to try to explain the stack gas flow cutoffs which occurred. Norlite did not have any findings which were indicative of a cause. It is theorized that water droplets from the Mist Pad quench water were hitting the stack gas probe. The ID Fan speed was reduced as well as the quench water flow to try to alleviate the situation. Norlite and its consultant will continue to evaluate each exceedance in order to implement the proper corrective action to further decrease the amount of MACT exceedances.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvraken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager

Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4 w/attachments

DCL: 2410



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
02/27/12 - 03/6/12

Start Date	Start Time	End Date	End Time	Downtime	#	Event	Cause	Parameter	Limit	Corrective Action
3/4/2012	0:26:49	3/4/2012	0:29:13	0:02:24		Malfunction	While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed	Back Chamber Pressure, 1 Second Delay	Opl	Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns
3/5/2012	12:25:18	3/5/2012	13:31:11	1:05:53		Malfunction	The LGF Pump for the Current Burn Tank Stopped Which Caused The CO's to Spike From the Loss of Fuel Input	Carbon Monoxide	Opl	Switched To A Different Tank
3/5/2012	16:49:17	3/5/2012	17:50:13	1:00:56		Malfunction	Lost Pilot Which Caused The Main Flame To Go Out Which Caused The CO's to Spike	Carbon Monoxide	Opl	Re-established Pilot
3/5/2012	20:07:26	3/5/2012	20:08:14	0:00:48		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	21:31:09	3/5/2012	21:34:50	0:03:41		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	22:18:15	3/5/2012	22:18:59	0:00:44		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	22:21:46	3/5/2012	22:28:50	0:07:04		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	23:03:33	3/5/2012	23:12:22	0:08:49		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	23:38:13	3/5/2012	23:38:42	0:00:29		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/5/2012	23:56:55	3/5/2012	23:57:33	0:00:38		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	0:22:51	3/6/2012	0:23:38	0:00:47		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	0:28:02	3/6/2012	0:28:48	0:00:46		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	0:48:02	3/6/2012	0:50:56	0:02:54		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	1:08:00	3/6/2012	1:09:10	0:01:10		Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Cleaned Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow/I&E Cleaned Probe

3/6/2012	1:16:00	3/6/2012	1:16:42	0:00:42	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	1:56:27	3/6/2012	1:58:09	0:01:42	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	2:44:02	3/6/2012	2:44:54	0:00:52	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	2:52:30	3/6/2012	2:53:00	0:00:30	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	2:57:01	3/6/2012	2:57:27	0:00:26	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	3:10:18	3/6/2012	3:11:01	0:00:43	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	3:28:22	3/6/2012	4:02:33	0:34:11	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	4:54:56	3/6/2012	5:04:58	0:10:02	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow
3/6/2012	5:17:49	3/6/2012	6:20:01	1:02:12	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/I&E Cleaned Probe	Stack Gas Flow Rate	Span	Adjusted Fuel Flow/I&E Cleaned Probe
3/6/2012	10:01:42	3/6/2012	10:19:26	0:17:44	Malfunction	Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span/Possible Water Droplets Hitting Probe From Mist Pad Quench Water	Stack Gas Flow Rate	Span	Lowered ID Fan Speed and Reduced Mist Pad Quench Water Flow